

May 17, 2019

The Honorable Philip Ting, Chair
Assembly Budget Committee
State Capitol, Room 6026
Sacramento, CA 95814

The Honorable Kevin McCarty, Chair
Assembly Budget Subcommittee No. 2 on Education Finance
State Capitol, Room 6026
Sacramento, CA 95814

Dear Assembly Members Ting and McCarty:

On behalf of the local educational agencies (LEAs) and the statewide education associations represented on this letter, we are writing to express our concerns with Governor Gavin Newsom's Special Education School Readiness Program. While we welcome the attention to the needs for students with disabilities in the 2019-20 State Budget proposal, we oppose the allocation of funds for Special Education in a manner that encourages greater identification of students with disabilities, punishes LEAs that have provided extensive intervention services, and provides funds to only a fraction of LEAs while the need is at a breaking point statewide.

First, the Governor's proposal would exacerbate existing Special Education funding inequities throughout California. For purely historical reasons, funding rates currently vary between \$488.28 and \$935.72 per average daily attendance (ADA). This inequity in and of itself needs to be corrected, and the Governor's proposal will double down on these disparities, providing an additional \$14,549 per eligible student to some LEAs that already receive far more resources per ADA than their neighboring LEA.

Second, the proposal incentivizes over-identification of students with disabilities by providing a significant financial gain to identify and keep students in Special Education programs, an incentive California has fought hard to avoid. While LEAs would be encouraged through legislative intent language to use the funds for early intervention services, there would be a perverse disincentive to reduce the Special Education population and therefore reduce the funding received. It will also be difficult for

LEAs near the eligibility thresholds to implement new ongoing programs as the threat of lost funding in the future would loom large.

We also believe the proposal is based on a faulty correlation between unduplicated pupils as a proxy for poverty and Special Education. Research on the nexus between disability and income is at best inconclusive, and data from California students show no association. And many LEAs with high concentrations of unduplicated pupils—Fresno Unified, Paramount Unified School District (Los Angeles County), Coachella Valley Unified School District (Riverside County), Bakersfield City School District (Kern County), and many more—would receive zero funds from this proposal because their identified population of students with disabilities falls below the statewide average.

Finally, of the approximately 2,000 LEAs in the state, only about 425 would receive *any* funds from this proposal. Fewer than 7% of the state's students with disabilities will generate additional resources through this program. And of those LEAs that do receive some funds, more than 60% would receive less than \$250,000. It is universally acknowledged that our schools face a growing funding need to provide students with exceptional needs his or her federally mandated guarantee to a free and appropriate public education and it is insupportable that such a significant amount of new resources for students with disabilities would be provided to so few.

We urge the Assembly to reject this funding methodology while maintaining the \$696.2 million allocation and instead use these resources to address the critical issues of establishing equity within Special Education funding, creating a funding stream for preschoolers with disabilities, and providing resources for students with the most severe needs. Assembly Bill 428 embodies this structure and could reach 50% of implementation with this significant investment of resources for students with disabilities if adopted by the Assembly.

Sincerely,



Martha Alvarez, Legislative Advocate
Association of California School Administrators



Gerald C. Shelton, Legislative Advocate
Atascadero Unified School District



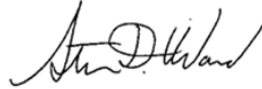
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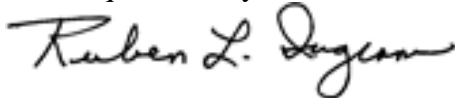
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Heather DiFede, Chair
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cc: Members, Subcommittee No. 2 on Education Finance

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